Dear Dr. HoneyCutt,

I am Ken Skog, I was a member of the two SAB Biogenic carbon panels, and a natural resource economist with the US Forest Service (now retired).

I was also a lead author for the IPCC 2006 Guidelines for preparing National Greenhouse Gas Inventories.

That IPCC report has 5 relevant guidelines for preparing estimates of emissions and sinks. Two of those are Comparability and Accuracy.
(Transparency, Completeness, Consistency, Comparability, and Accuracy)

I think recommendations in the SAB draft are inconsistent with the Comparability and Accuracy guidelines. I think the Biogenic carbon panel report met those guidelines given constraints

> I think the Biogenic carbon panel report met those guidelines given constraints with BAFsigmaT and modeling recommendations. Constraints included 1) use of CO2 emissions and land carbon change in computations rather than radiative forcing and 2) computation of average BAF over many years since land carbon change is influenced by the time path of increased forest biomass use for energy.

Comparability means estimates can be compared across sectors and nations.

Accuracy means estimates should neither over- nor under estimate so far as can be judged and uncertainties should be evaluated and reduced if possible.

The SAB Draft promotes a policy-based time horizon for estimating BAF values, but this is inconsistent with science-based time horizons used for other climate change impact metrics.

Two examples related to comparability

First, Consider the social cost of carbon which estimates economic damages from 1 tonne of CO2 emissions to assess benefits of CO2 reduction. The estimate is based on damages over 300 years. It captures the effects of the long lifetime of CO2 in the atmosphere and long run inertia affects. The metric is used across agencies with varying policy goals.

If a biogenic emission BAF is computed with a short policy horizon the resulting adjusted CO2 emission cannot have its cost assessed using the social cost of carbon because it does not include long term effects assumed to be included in the social cost of carbon.

Second, CO2 emission equivalent metrics are widely used to compare the impact of CO2 and non-CO2 gases such as methane and nitrous oxide based on 100 year radiative forcing. IPCC and EPA guidelines establish that one 1 tonne of CO2 eq is the radiative forcing caused by CO2 in over 100 years. This impact metric is widely used in analysis of the impact of GHGs and

policies for addressing climate change. Using a policy-based time horizon for BAFs would be a significant departure from the national and international convention for comparing different gases over a long time frame.

It is unrealistic to think the social cost of carbon or non CO2 gas characterization factors would be recomputed for short timeframes to assess short term policies.

-To give cost and CO2-eq values more comparable to the adjusted CO2 values from BAFs determined by short time frames.

Two comments on Accuracy

On page Pg 1 the report says “Often, simple models are best.”

I would suggest accurate models are best.
A simple model could be quite inaccurate and give a sense of false precision while a sufficiently complex model would be more accurate but less precise and, importantly, allow for a realistic assessment of uncertainty.

On pg 2 the report says “The reference point approach, if adjusted at regular intervals (e.g., every 5 to 10 years) …, would address the SAB’s earlier concerns, …”

This SAB report should not endorse the reference point baseline since it does not meet the criteria to accurately estimate the effect of increased bioenergy use.

Thank you for the opportunity to provide comments.